

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Wikimedia Foundation, et al.,

**Plaintiff(s)**

**v.**

National Security Agency / Central Security Service, et al.,

**Defendant(s)**

\*

\*

\*

\*

**Case No.:** 1:15-cv-00662-RDB

\*\*\*\*\*

**MOTION FOR ADMISSION *PRO HAC VICE***

I, David Rocah, am a member in good standing of the bar of this Court.

My bar number is Bar No. 27315. I am moving the admission of Patrick Toomey  
to appear *pro hac vice* in this case as counsel for Plaintiffs.

We certify that:

1. The proposed admittee is not a member of the Maryland bar and does not maintain any law office in Maryland
2. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts:

**State Court & Date of Admission**

State of Massachusetts (Dec. 12, 2008)

State of New York (Jan. 11, 2012) (Second  
Dep't, Appellate Division)

**U.S. Court & Date of Admission**

U.S. District Court for the Southern  
District of New York (Feb. 3, 2012)

U.S. District Court for the Eastern  
District of New York (Feb. 3, 2012)

U.S. District Court for the District of  
Colorado (July 2, 2014)

U.S. District Court for the District of  
Colorado (July 2, 2014)

3. During the twelve months immediately preceding this motion, the proposed admittee has been admitted *pro hac vice* in this Court 0 times.
4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction. (NOTE: If the proposed admittee has been disbarred, suspended, or denied admission to practice law in any jurisdiction, then he/she must submit a statement fully explaining all relevant facts.)

5. The proposed admittee is familiar with the Maryland Lawyers' Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court, and understands he/she shall be subject to the disciplinary jurisdiction of this Court.

6. The proposed admittee understands admission pro hac vice is for this case only and does not constitute formal admission to the bar of this Court.

7. Either the undersigned movant or [n/a], is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.

8. **The \$50.00 fee for admission pro hac vice accompanies this motion.**

9. We hereby certify under penalties of perjury that the foregoing statements are true and correct.

Respectfully submitted,

MOVANT

/s/ David Rocah  
Signature

David Rocah  
Printed Name

American Civil Liberties Union  
Foundation of Maryland  
Firm

3600 Clipper Mill Rd., #350  
Address

Baltimore, MD 21211  
City, State, Zip Code

(410) 889-8555  
Telephone Number

(410) 366-7838  
Fax Number

rocah@aclu-md.org  
Email Address

PROPOSED ADMITTEE

/s/ Patrick Toomey  
Signature

Patrick Toomey  
Printed Name

American Civil Liberties Union  
Foundation  
Firm

125 Broad Street, 18<sup>th</sup> Floor  
Address

New York, NY 10004  
City, State, Zip Code

(212) 519-7816  
Telephone Number

(212) 549-2654  
Fax Number

ptoomey@aclu.org  
Email Address